



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

DEC 16 2015

██████████
Attorney at Law
Shook, Hardy & Bacon, L.L.P.
2555 Grand Boulevard
Kansas City Missouri 64108

Ex. 6

Dear ██████████

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Re: Meramec Caverns - Volatile Organic Compounds Removal Efforts

On March 31, 2015, representatives of TRW Automotive U.S. LLC (TRW), the U.S. Environmental Protection Agency (EPA), the U.S. Geological Survey (USGS), and the Missouri Department of Natural Resources (MDNR) met to discuss the volatile organic compounds (VOCs) found in the air within both Meramec Caverns and the attached Meramec Caverns entrance and visitors' building (visitors' building) and the VOCs in groundwater in the area of Sullivan, Oak Grove Village, and La Jolla Cave Complex. Environmental sampling has shown there to be concentrations of VOCs in the air within both Meramec Caverns and the attached visitors' building which are high enough to create health concerns for Meramec Cavern's employees and potentially for guests touring the cave and the visitors' building. VOCs are also found in the stream that flows within Meramec Caverns.

During the March 31 meeting, USGS made a presentation demonstrating that VOCs have migrated to Meramec Caverns from releases to the environment caused, or significantly contributed to, by the former TRW facility in Sullivan, Missouri. Additionally, TRW's VOC wastes were disposed of at the old Sullivan Municipal Landfill. Based on the information collected, EPA believes that TRW may be liable under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as a result of releases of hazardous substances at the former TRW Sullivan facility and/or the Old Sullivan Municipal Landfill which have impacted areas downgradient.

Over the past several months TRW, through its contractor, has been working with the Meramec Cavern owners to address the VOCs in air within the cave and visitors' building. Major actions that have been taken include (1) the installation of a set of airlock doors to separate the underground stream from the rest of the cave area, and (2) the demolition of a wall in the amphitheater to increase air flow in and out of the cave. Unfortunately, those efforts, along with other actions, have not been successful in adequately reducing the VOC air contamination within either the human-occupied portion of the cave or within the visitors' building. As a means of eliminating the VOCs from the visitors' building, it may be necessary to physically separate the current structure from the cave entrance or, if separation is impracticable, to demolish the current building and replace it with a structure that is not attached to the cave entrance.

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The EPA requests a meeting with TRW in early January, 2016, to discuss the current status of the efforts to address the VOC air contamination within the cave and visitors' building and any further steps which may be taken to reduce and/or eliminate the VOCs in air. Additionally, we want to discuss the willingness of TRW to enter into a CERCLA 106 Administrative Order on Consent to take the necessary removal action to eliminate the VOC contamination exposures currently occurring in the visitors' building. It is generally EPA's preference to negotiate a CERCLA 106 Administrative Order on Consent versus having to initiate a Unilateral Order or referral for judicial action. Contemporaneous with the efforts to eliminate the VOC air contamination from the visitors' building, the ongoing efforts to reduce/eliminate the VOC contamination within the cave should be continued.

The EPA is available to meet at our offices in Lenexa during the week of January 11-15 and January 19-22 after the Martin Luther King Holiday. Please direct your response with a proposed meeting date to the undersigned via U.S. mail, or email to stevens.jim@epa.gov. If you have any questions concerning this letter, please contact Jim Stevens via telephone at (913) 551-7322 or email.

Sincerely,

A handwritten signature in black ink that reads "James D. Stevens". The signature is fluid and cursive, with the first name "James" and last name "Stevens" clearly legible, and "D." as a middle initial.

James D. Stevens
Assistant Regional Counsel

cc: Tonya Howell, EPA Superfund
John Schumacher, USGS
Candice McGhee, MDNR